

## ***Exhibit 2***

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

---

TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

Case No.  
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC.,  
WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA, and BRUCE  
MAPLEY, SR.,

VIDEOTAPED DEPOSITION  
UPON ORAL EXAMINATION  
OF JAMES ROWLAND

Defendants.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC.,

Cross Claimant,

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and  
JAMIE SCHULZE,

Cause No.  
CV 20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., and  
WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA,

Defendants.

---

**James Rowland**

1       A.     No.    There was about 40 elders in the  
2     group, some new ones, some old ones.   And I can't  
3     even remember who the instructor was.   He might  
4     have been from New York.

5       Q.     Okay.   Someone you hadn't seen before.

6       A.     Yeah, he was just here to teach that class  
7     and then go back to New York or whatever.

8       Q.     And in addition to the Bible, were they  
9     using other books as part of your training?

10      A.     Yeah.   Yeah, with the -- like, the  
11     teaching book, you know, like, one of the  
12     publications is to become a better teacher, you  
13     know, and --

14      Q.     Let me show you a document.   This is  
15     called "Kingdom Ministry School Course."

16      A.     Yeah.

17      Q.     And it's Bates WTPA 1 is the first page of  
18     this document.   It's the document that was given to  
19     us by WTPA, the Pennsylvania corporation.

20      A.     Yeah.

21      Q.     And you'll see there -- can you read that  
22     okay?

23      A.     Yeah.

24      Q.     It's dated October 1972?

25      A.     Uh-huh.   Yeah, that's the thing that --

**James Rowland**

1 that's the publication that was used.

2 Q. For the training as an elder?

3 A. Yeah.

4 Q. Can I go back to that cover page for a  
5 second? So "Watch Tower Bible and Tract Society of  
6 Pennsylvania, 1972," does that look like the  
7 document that maybe you saw when you were being  
8 trained in 1975?

9 A. Yeah. Yeah, it's a book about like this  
10 (indicating). It's a red -- it's -- what do they  
11 call them now? A real deep red, burgundy almost.

12 Q. And you were using your hands to describe  
13 a very big book, thick?

14 A. About like that.

15 Q. Yeah.

16 A. And that was the Kingdom Ministry School.

17 Q. How much time did you spend at that  
18 training in Billings? Do you remember?

19 A. I think it was a month. It might have  
20 been -- it might have been two weeks. But it was a  
21 number of days involved.

22 Q. Okay. So fairly extensive, then.

23 A. Yeah.

24 Q. And did you stay in Billings or did you  
25 drive back and forth?

68

**James Rowland**

1 A. I had to stay in Billings.

2 Q. And did they pay for that for you?

3 A. No.

4 Q. You had to pay for it on your own?

5 A. Yeah.

6 Q. Okay. Let's maybe mark -- can we mark  
7 this and keep it in the binder as No. 2?

8 (Deposition Exhibit No. 2 was marked for  
9 identification.)

10 BY MR. SHAFFER:

11 Q. We'll come back to that document later,  
12 all right?

13 A. Okay.

14 Q. Did the other elders from the Hardin  
15 Congregation come with you for that training in  
16 1975, or --

17 A. No. They had been through that I guess  
18 the year before. And being that I was new at the  
19 job, so to speak, they invest the time and effort  
20 into this so you're a better teacher and a better  
21 overseer.

22 Q. When you say that, you mean the people  
23 from New York who are doing the training in  
24 Billings?

25 A. Yeah.

**James Rowland**

1 Q. Okay. And do you recall, were there other  
2 books besides this Kingdom Ministry School Course  
3 book that they used to help train you? Were  
4 there --

5 A. Well, they used the Bible, of course, all  
6 the time. But I think there was enough in there to  
7 keep you busy. And that's why, you know, I refer  
8 to that, and I still remember it.

9 Q. Yeah. And so describe to me what your  
10 days were like in Billings during that training.

11 A. It was just a training, period, and not  
12 much of anything else.

13 Q. Was everybody in the same room?

14 A. Yeah. It was in one of the Kingdom Halls.  
15 I can't remember.

16 Q. And is there someone at the front of the  
17 room talking to everybody else?

18 A. Yeah, uh-huh. Yeah. Lecture series, you  
19 know, lecture style.

20 Q. And everybody's got their own copy of the  
21 book?

22 A. Uh-huh.

23 Q. This Kingdom Ministry School Course book?

24 A. Yeah, plus their own notebook.

25 Q. And are you just going through it, working 70

**James Rowland**

1 your way through it day by day?

2 A. Yeah. And there was, you know, like a lot  
3 of questions on it, and --

4 Q. So you just raise your hand if you have a  
5 question?

6 A. Yeah. And it was a fairly good teaching  
7 event, learning.

8 Q. Okay. Was it helpful to you in helping --

9 A. It was, yeah.

10 Q. And tell me how. Tell me how it helped  
11 you.

12 A. Well, you know, you have questions as to,  
13 you know, the responsibility you have in talking to  
14 people, and what happens if you're rejected or  
15 physically assaulted or whatever, you know, how to  
16 handle situations like that, and just all kinds of  
17 stuff that helped you as a minister, I guess.

18 Q. And so as an example, right, if someone  
19 came to you as an elder and said, "Yeah, I was  
20 physically assaulted," right, "Somebody punched me  
21 in the face. Mr. Rowland, Brother Rowland,  
22 so-and-so punched me in the face. What do I do,"  
23 would your training in Billings and your reference  
24 of this Kingdom Ministry School Course, would that  
25 have helped you understand how to help that person? 71

**James Rowland**

1 A. Uh-huh.

2 Q. That was a "yes"?

3 A. Uh-huh.

4 Q. "Yes"?

5 A. Yes.

6 MR. TAYLOR: Object to the form.

7 BY MR. SHAFFER:

8 Q. And that's how -- that training in  
9 Billings and this book here, this Exhibit 2, that  
10 informed you on how to work as an elder and how to  
11 communicate with the other members of the  
12 congregation and help them; is that right?

13 A. Yes.

14 Q. And would you reference back to this book,  
15 this Exhibit No. 2, while you were working as an  
16 elder? Would you look at it from time to time?

17 A. Yeah, any of the publications, you know,  
18 to -- something specific that you don't know  
19 exactly how to handle, you go in here and under  
20 that title or that subject area, and it was very  
21 helpful.

22 Q. Okay. So just going back to kind of your  
23 evolution -- I'm going to call it your evolution as  
24 a member of the church, in 1969, you're baptized,  
25 you're a book study conductor.